Davis County Breakout Discussion Notes

December 8, 2011

POINT

What are the point sources?
> 4 refineries
> Bountiful Power
> Hill AFB
> Wasatch Waste

How many point sources in Davis County?
> We will get a clear document together and distribute

Are there point source contributors that cause greater impacts than others?
> No attempt at apportionment made

What industries contribute the most direct/VOC emissions?
> SIP would probably look at categories instead of individuals

Minor point sources- How many in this air shed?
> 5-10 major (100+ tons)
> 20-25 smaller permitted sources
> Could there be a required BACT requirement for these?
>> GACT' "generally"

What is the 100 ton threshold?
> Line drawn only for analysis purposes
> Permit required for anyone that affects quality of air shed
> More stringent as sources become larger

What can we do with grand fathered small point contributors?
> What % are they?
> Can the SIP address grand fathering?

Can't inspect smaller sources because they don't have compliance requirements.
> Self reporting/basic inspection

Traction on "projected future"?
> DAQ having discussions with EPA already

Who needs a permit?
    Printers (presses)
    Cabinet shops
    Mines/gravel
    Power generation

Who can burn what? What controls this?
    Permit/BACT review
    Looks at pollutants (189 – all of them)
    They don't typically violate individually, but create cumulative issues

Modeling projections – how are reductions (tech) balanced against growth?
    SIP requires RACT/BACT

RACT timeline?
    Late spring to complete stakeholder process
    RACT discussions ongoing

IN modeling, how are we looking at point sources?
    Permits last forever
    DAQ can open 3A though SIP process
    Same basic cost/benefit standards applied

Provide the list
    Polluters and pollutants

Does DAQ assess PM 2.5, VOC, and NOX separately in the permitting process?
    Individually yes, but modeled, no.

Credit- explanation- volunteers vs. mandate?
    EPA and model

Architectural coatings R340- not included

Are consumer solvents already controlled by rule?

What are the top reactive VOCs? How are they applied?

If one can affect VOC coatings content can that be done state/county/air shed wide?

Monitoring and enforcement of area sources are is that why it is hard to control?

Because they are so numerous and diverse they are hard to quantify

Varied at regional or national level?
UDAQ works with EPA 8- who sometimes gets approval from national

MOBILE

Has anyone looked at the cost of providing free transit on red days?

    Yes, legislature and Salt Lake Chamber of Commerce working on this

What are the one pound decrees in RVP?

    Helps vehicles start more easily, not really an issue with newer vehicles

    Refineries would have to change the blend during winter

    Probably will cost the refineries, no one has asked them yet

    DAQ would have to work with EPA on this, requires a waiver

    E/O increases RVP which actually increases VOC in summer

Is there a bigger benefit for CNG or electric?

    At plug electric is cheaper, but incremental purchase cost is higher

    Increase in CNG fleet doesn't yield much benefit

    HB70 is a concern – converting clean cars to dual fuel

Speed limit analysis – what's being emitted at certain speeds?

    Yes, 30-40 mph is the ideal speed

    Happy medium to adjust for time on road is 55-65

If looking at CNG are the costs from extraction worth the benefit to AQ?

    SIP does not take into account the "well to wheel" costs

    Info is available however

Do we know how many old vehicles on the road?

    Cleaner vehicles are overwhelmed by the older vehicle emissions

    Replacement of newer future vehicles yields a smaller benefit

Does Davis County have a stricter I/M program?

    No, it's comparable to those along the Wasatch front

Does Idaho have I/M?

    Only in the counties near Boise

    Cache Valley Idaho keeping an eye on I/M as option

Have we considered lowering speed limits?

    Yes, legislature requested analysis – no difference between 55 and 65, but big difference between 65 and 85

    DAQ found enforcing the 65 mph speed limit would net the best benefit

    Counties could do more enforcement during inversion periods/episode days

    Use public outreach to educate the public/UDOT signs

Do we have emissions by vehicle age chart?

We'll get one

Is the vehicle age chart local or national?

Wasatch front specific

Are the new vehicle standards CAFE?

No, but the new standards are moving parallel with CAFE

Voluntary measures yield the least credit.

Does Utah have a program to report dirty/smoking vehicle program?

Salt Lake, Cache and Utah Counties have them

Unsure whether the programs are advertised

Can we encourage people with older vehicles to take transit during inversions?

Incentives? Repair assistance program? Free transit pass?

Student groups could be a target for a program like this

CARB strategy

Is a proxy for cleaner vehicle standards, other option is EPA's version

Fed program does fleet aging around NOX, California does there's around VOC

May get more benefit from CA, but is politically unpopular

RVP is a federal issue?

Yes, DAQ is doing analysis to understand possible benefits

Effect of legislature on I/M?

Effect of land use planning on transit/trip reduction?

Mobile strategy bundle strategies appear to be things the state could implement.

Yes, DAQ has a number of incentives and programs

They are not regulatory, only voluntary and economic

There is momentum on idling, etc- could be palatable in other areas but varies (also transit use)

For additions to TRAX need to be cautions of double counting

There is some question about CNG conversion vs. cleaner tech?

Flow of traffic- are more controls worth it?

Maybe, California has had some success, cone placement and accident protocols for moving traffic.

TCM are addressing these through WFRC

Speed limit discussion at legislature

Most VOCs come from gas

Noise ordinances for larger vehicles are changing hours of operation in some cities- do these restrictions impact AQ?

Is there support for employer based trip reductions?

Problematic for citizens to coordinate alternate transportation- not feasible

Some companies already have infrastructure- Jet Blue

Difficult for manufactures and waste haulers

Could flex schedules help?

Possibly help with traffic flow

Obvious benefit of state work schedules on traffic flow

How much would increased public transit use help the numbers?

Would help in both short and long term, not sure how much

Infrastructure recommendations would take too long to count for this SIP

Incentives for free passes in big institutions

Any tax incentives for transit if you live farther/closer to job?

TOD, trip reduction

Free fares are a touchy subject

Federal government provides subsidies for transit, not convieniet in Utah

Cost of energy/fuel is a primary motivator

Gas tax and mass transit

More efficient/convenient transit- European model

Can we ditch E/O?

Probably not, it's a federal rule

DAQ would like to, it's both a winter and summer problem

Have any states gone back to non E/O?

Texas tried but wasn't successful

Could like at market impacts (pipeline costs, etc.)

Has the bundle been broken down?

        DAQ built assumptions in 3% not guaranteed

        EPA right now probably won't give more credit to voluntary reductions

AREA

NH4 reduction
> Not worth it?
> Is that Davis vs. state wide?
> Statewide but Utah County and Cache

Where does NH4 come from?
> Auto

NH4 reductions will not have impact

18% - Are you assuming no one is complying in Davis County?
> Rule effectiveness – compare to inventory, 1/3 of that

18% reduction vs. 22% is confusing

Common VOC on Chart- 18% category surface coating
> % reduction vs. % contribution

Degreasing and solvent cleaning – what does it include?
> Tanks
> Auto shop
> Tank cleaning
> Mechanic shops

Architectural coating- painting house and what else?

Who enforces the large numerous shops that service the refineries and industrial sectors?
> Depends on 55 exempt or Minor AO

Is there a list of small sources in Davis County?
> It's on the UDAQ website by county

Are we getting better on solvents that are not so polluting?

What is the application of asphalt?

Residential stoves and fire places – How do we get a reduction?
> We may go straight to red days
> Has direct PM 2.5 – 1:1 reduction

How do you measure the 3.25% PM 2.5?

Commercial cooking – what does that mean?
>   Car, grills, family restaurants, chains, banquets, hospitals
>   Charbroiling of meat – big bang for buck

Are all these strategies cost neutral or cost positive?
>   No- only restaurants. Other industries and controls need further investigation. Drill down.

How do these impact commercial restaurants compared with point and mobile?

What controls can be put on restaurants?
>   Common for all types
>   CAT convertor- cost neutral
>   How to implement? New/expand incentives
>   Can franchises be leaders in stalling CC

Pass inspection by health department

Would it be more effective if EPA mandates rule (i.e. restaurants)?

Recommend mandates be implemented and due by 2019

Common use- definition? HSE product replacement.

Does agriculture include food spoilage waste?
>   Eco-scrapes?
>   Organic digesters

Lots of NH4 area source BMPs are available because of warehouse storage.
>   Where is urban NH4 coming from?

Utah County has large housed livestock

VOCs
>   Beauty salons
>>   Area source, are they included on commercial/domestic?
>   Graphic arts
>>   Contribution amount-Inks
>>   Does it include paints

MACT

Maximum achievable control technologies

SIP change to go straight to red days

Can we do seasonal implementation of the rules?

Can rules be directed to commercial operations?

How small are small source? Printing (i.e.)

Better understanding of CTGs.

"X percent of Y"- Why make a categorical change if it has little collective AQ value?
    We need to get below the 2008 levels

Relationship between economic development and AQ

What is the punishment for non-attainment?
    Lose highway funding
    Record/document penalties
    They take it out of State's hands
    Bad indirect business effects

What specifically could be done in Davis County with sources?
    Refinery shut down/start up would cause more emissions instead of less
    Big picture- BACT reduction
    Mandates vs. incentives